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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VIO: 26 U.S.C. §7206(1)

v.

D-1 PETER RAYMOND NWOKE,

Defendant.

Case:2:18-cr-20686 Judge: Hood, Denise Page MJ: Stafford, Elizabeth A. Filed: 10-11-2018 At 04:14 PM SEALED MATTER (EK)

INDICTMENT

THE GRAND JURY CHARGES:

False Statement on Tax Return – 2011 Return 26 U.S.C. § 7206(1)

That on or about October 16, 2012, in the Eastern District of Michigan, Southern Division, PETER RAYMOND NWOKE, defendant herein, a resident of Grosse Pointe Woods, Michigan, did willfully make and subscribe an individual U.S. Individual Tax Return (1040) which was verified by a written declaration that it was made under penalties of perjury, and was filed with the Internal Revenue Service, which said joint U.S. Individual Tax Return he did not believe to be true and correct as to every material matter, in that the said joint U.S. Individual Tax Return reflected taxable income for the calendar year of 2011 for PETER

RAYMOND NWOKE and his spouse of \$152,569.00, and that the amount of tax due and owing thereon was the sum of \$48,175.00, whereas, as he then and there well knew and believed, their joint taxable income for the calendar year of 2011 was the sum of approximately \$868,978.00, upon which joint taxable income there was owing to the United States of America an income tax of approximately \$265,180.00, leaving a tax due and owing at that time of approximately \$217,005.00, in violation of Title 26, United States Code, Section 7206(1).

False Statement on Tax Return – 2012 Return 26 U.S.C. § 7206(1)

That on or about October 17, 2013, in the Eastern District of Michigan, Southern Division, PETER RAYMOND NWOKE, defendant herein, a resident of Grosse Pointe Woods, Michigan, did willfully make and subscribe an individual U.S. Individual Tax Return (1040) which was verified by a written declaration that it was made under penalties of perjury, and was filed with the Internal Revenue Service, which said joint U.S. Individual Tax Return he did not believe to be true and correct as to every material matter, in that the said joint U.S. Individual Tax Return reflected taxable income for the calendar year of 2012 for PETER RAYMOND NWOKE and his spouse of \$139,127.00, and that the amount of tax due and owing thereon was the sum of \$43,926.00, whereas, as he then and there

well knew and believed, their joint taxable income for the calendar year of 2012 was the sum of approximately \$262,228.00, upon which joint taxable income there was owing to the United States of America an income tax of approximately \$85,692.00, leaving a tax due and owing at that time of approximately \$41,766.00, in violation of Title 26, United States Code, Section 7206(1).

<u>COUNT THREE</u> False Statement on Tax Return – 2013 Return 26 U.S.C. § 7206(1)

That on or about October 17, 2014, in the Eastern District of Michigan, Southern Division, PETER RAYMOND NWOKE, defendant herein, a resident of Grosse Pointe Woods, Michigan, did willfully make and subscribe an individual U.S. Individual Tax Return (1040) which was verified by a written declaration that it was made under penalties of perjury, and was filed with the Internal Revenue Service, which said U.S. individual Tax Return he did not believe to be true and correct as to every material matter, in that the said individual U.S. Individual Tax Return reflected taxable income for the calendar year of 2013 for PETER RAYMOND NWOKE and his spouse of \$144,057.00, and that the amount of tax due and owing thereon was the sum of \$58,398.00, whereas, as he then and there well knew and believed, their joint taxable income for the calendar year of 2013 was the sum of approximately \$238,679.00, upon which individual taxable income there

was owing to the United States of America an income tax of approximately \$88,239.00, leaving a tax due and owing at that time of approximately \$29,841.00, in violation of Title 26, United States Code, Section 7206(1).

COUNT FOURFailure to Pay Income Taxes – 2011 26 U.S.C. § 7203

During the calendar year 2011, in the Eastern District of Michigan, Southern Division, PETER RAYMOND NWOKE, defendant herein, who was a resident of Grosse Pointe Woods, Michigan, had and received taxable income of approximately \$868,978.00, on which taxable income there was owing to the United States of America an income tax of approximately \$265,180.00. He was required by law to pay, on or before April 15, 2012, that income tax to the Internal Revenue Service Center, at Cincinnati, OH, to a person assigned to receive returns at the local office of the Internal Revenue Service at Detroit, MI, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue. Well aware of his obligation to pay income tax on all of his taxable income, he did willfully fail, on April 15, 2012, to pay the income tax due, in violation of Title 26, United States Code, Section 7203.

Failure to Pay Income Taxes – 2012 26 U.S.C. § 7203

During the calendar year 2012, in the Eastern District of Michigan, Southern Division, PETER RAYMOND NWOKE, defendant herein, who was a resident of Grosse Pointe Woods, Michigan, had and received taxable income of approximately \$262,228.00, on which taxable income there was owing to the United States of America an income tax of approximately \$85,692.00. He was required by law to pay, on or before April 15, 2013, that income tax to the Internal Revenue Service Center, at Cincinnati, OH, to a person assigned to receive returns at the local office of the Internal Revenue Service at Detroit, MI, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue. Well aware of his obligation to pay income tax on all of his taxable income, he did willfully fail, on April 15, 2013, to pay the income tax due, in violation of Title 26, United States Code, Section 7203.

Failure to Pay Income Taxes – 2013 26 U.S.C. § 7203

During the calendar year 2013, in the Eastern District of Michigan, Southern Division, PETER RAYMOND NWOKE, defendant herein, who was a resident of Grosse Pointe Woods, Michigan, had and received taxable income of approximately

\$238,679.00, on which taxable income there was owing to the United States of America an income tax of approximately \$88,239.00. He was required by law to pay, on or before April 15, 2014, that income tax to the Internal Revenue Service Center, at Cincinnati, OH, to a person assigned to receive returns at the local office of the Internal Revenue Service at Detroit, MI, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue. Well aware of his obligation to pay income tax on all of his taxable income, he did willfully fail, on April 15, 2014, to pay the income tax due, in violation of Title 26, United States Code, Section 7203.

THIS IS A TRUE BILL

MATTHEW SCHNEIDER United States Attorney

s/GRAND JURY FOREPERSON

s/WAYNE F. PRATT CHIEF, Health Care Fraud Unit

s/JOHN C. ENGSTROM Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226

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Email: john.engstrom@usdoj.gov

Dated: October 11, 2018

United States District Court Eastern District of Michigan	Criminal Case Co	Judge: Ho	Case:2:18-cr-20686 Judge: Hood, Denise Page	
OTE: It is the responsibility of the Assistant U.S. Attorney signing this form		MJ: Stafford, Elizabeth A. Filed: 10-11-2018 At 04:14 PM SEALED MATTER (EK)		
Companion Case Informatio	n - 1985 - 1973	Companion Case	Number:	
This may be a companion case based upon LCrR 57.10 (b)(4)1:		Judge Assigned:		
☐ Yes ⊠ No		AUSA's Initials:		
Case Title: USA v. PETER I	RAYMOND NWOKE			
County where offense occu	rred: WAYNE			
Check One: ⊠Felony	□Mise	demeanor	□Petty	
Indictment/Info	ormation no prior com ormation based upon pormation based upon p	prior complaint [Ca	se number:] plete Superseding section below].	
Superseding Case Information	on	- <u>-</u>		
uperseding to Case No: Judge:				
Corrects errors, no addit Involves, for plea purpos Embraces same subject	ional charges or defenda ses, different charges or a matter but adds the addi	adds counts.	or charges below:	
Defendant name	Cha	ırges	Prior Complaint (if applicable)	
Please take notice that the below he above captioned case.	listed Assistant Unit	ed States Attor	ney is the attorney of record for	
•	\mathcal{M})((//		
October 11, 2018 Date	JOHN C.	JOHN C. ENGSTROM		
	Assistant U	Inited States Attor	-	
		ort Street, Suite 2 I 48226-3277		
	Phone:(31	3) 226-9571		
	Fax: (31	(3) 226-2621	rom@usdoj.gov	
	⊏-Maii add Attornev F	aress: John.engs Bar #: P38436		

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.